

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

SKY TIFFANY LAWSON,

Defendant

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CRIMINAL NO. BAH-22-219

UNITED STATES' MOTION FOR PRELIMINARY ORDER OF FORFEITURE

The United States of America, by its undersigned attorneys, respectfully moves this Court for the issuance of a Preliminary Order of Forfeiture in the above-captioned case pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2(b) of the Federal Rules of Criminal Procedure. A proposed Preliminary Order of Forfeiture is submitted herewith. In support thereof, the United States sets forth the following:

1. On November 30, 2022, a federal grand jury sitting in the District of Maryland returned a Superseding Indictment, charging Sky Tiffany Lawson (the "Defendant") with Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1349 (Count One), Wire Fraud, in violation of 18 U.S.C. § 1343 (Counts Two through Thirty-Four), and Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A(a)(1) and (c)(5) (Count Thirty-Eight). ECF No. 97.

2. The Superseding Indictment also included a forfeiture allegation which provided notice that the United States intended to seek forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of the Defendant of the offenses alleged in Counts One through Thirty-Four of the Superseding Indictment.

3. On January 22, 2025, the Defendant pled guilty to the offenses alleged in Counts One and Thirty-Eight of the Superseding Indictment. ECF No. 306. As part of her guilty plea,

the Defendant agreed to entry of an order of forfeiture to include a money judgment in the amount of at least \$25,000.00 in U.S. currency equal to the value of the property derived from, or otherwise involved in, the Defendant's offenses.¹ *Id.* ¶ 12.

4. In support of his guilty plea, the Defendant executed a Stipulation of Facts in which the Defendant admitted that between approximately March 2020 and October 2021, the Defendant knowingly and willfully conspired and agreed with others to commit wire fraud by devising and executing a scheme to defraud the United States, multiple financial institutions, and multiple states by filing fraudulent unemployment insurance claims using the personally identifying information of victims and obtaining money. ECF No. 306. The Defendant obtained \$25,000.00 from participating in the conspiracy.

5. Pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2(b)(2) of the Federal Rules of Criminal Procedure, the United States is now entitled to a forfeiture money judgment in the amount of \$25,000.00 in U.S. currency against the Defendant.

6. Further, the United States may move at any time, pursuant to Rule 32.2(e)(1)(B) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(p), to forfeit any property of the Defendant up to the value of the forfeiture money judgment included in the Preliminary Order of Forfeiture. Upon issuance of any order forfeiting specific property, the United States will publish notice in accordance with 21 U.S.C. § 853(n)(1) and Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure.

¹ As part of her guilty plea, the Defendant agreed to entry of an order of forfeiture to include a money judgment in the amount of at least \$34,000.00. ECF No. 306 at ¶ 12. However, after entering into the plea agreement, the parties conferred further and agreed that the money judgment amount to be listed in the order of forfeiture should be \$25,000.00, instead of the \$34,000.00 agreed to as part of her plea agreement. *Id.* The Defendant has consented to the amount set forth in this motion and the proposed order.

7. The United States also seeks permission to conduct any discovery that might be necessary to identify, locate, or dispose of forfeited property, pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(m).

WHEREFORE, the United States requests that this Court:

- (a) enter the Preliminary Order of Forfeiture in the form submitted herewith;
- (b) include the forfeiture, as set forth in the Preliminary Order of Forfeiture, in the oral pronouncement of the Defendant's sentence;
- (c) retain jurisdiction for the purpose of enforcing the forfeiture; and
- (d) incorporate the Preliminary Order of Forfeiture in the criminal judgment entered against the Defendant, pursuant to Federal Rule of Criminal Procedure 32.2(b)(4).

Respectfully submitted,

Kelly O. Hayes
United States Attorney

By: /s/
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